

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

October 24, 2011

To Whom It May Concern:

The University of Iowa Hospitals and Clinics (UIHC) is requesting a waiver of the Federal Communications Commission (FCC) Narrowbanding Deadline. We are requesting a one-year extension for meeting the January 1, 2013 deadline. The supporting documentation for this request is as follows:

*Steps already taken to plan for, initiate, and complete the transition to narrowband operations*

The UIHC currently has two paging system frequencies (UHF 453.025, call sign WPNR291 and VHF 152.0075, call sign WXR228). For several reasons it was unclear to the UIHC whether we would be required to narrowband on either of these frequencies. In early 2010 the UIHC attorney contacted the FCC asking for direction on this issue. We were told in **July 2010** by the FCC (Melvin Spann, Mobility Division) that we **did not** have to narrowband on **either** of these frequencies (see Attachment I). Following this decision the UIHC moved ahead with other plans, and did not allocate any funds or efforts to narrowbanding.

In April of 2011 the UIHC received a letter from the FCC regarding the need for compliance on our UHF frequency with the January 1, 2013 narrowbanding deadline. We sent a request to [narrowbanding@fcc.gov](mailto:narrowbanding@fcc.gov) asking for clarification, as our understanding from the previous correspondence in July 2010 with the FCC was that we were exempt from this mandate.

In late **May 2011** the FCC (Roberto Mussenden) indicated that we **did** indeed need to narrowband on our UHF frequency, stating that the first ruling we received from the FCC had been a mistake (see Attachment II).

Because of this change in ruling by the FCC the UIHC has lost almost an entire year of preparation time to meet the deadline. It is because of this lost time that we are requesting a one-year extension for complying with the narrowbanding mandate.

*System size and complexity*

The UIHC UHF frequency (453.025) currently supports approximately 6,000 pagers. The paging system is the primary communication tool used by clinical and hospital staff.

The paging system is also used for all 'group' paging notifications, for both emergency and routine communications (i.e. Code Blue, Code Green, Rapid Response, Adult and Pediatric Trauma Teams). There is a web paging application that all staff use to send text messages to these pagers. There are over 25,000 pages sent to the UHF and VHF pagers each day.

Whether system equipment is narrowband-capable or must be replaced or upgraded

The transmitters on the UIHC UHF frequency are narrowband-capable, and will need to be reprogrammed as needed. None of the pagers themselves are narrowband-capable. They will all have to be replaced or migrated to another technology.

Whether the licensee plans additional system upgrades or improvements in addition to converting to narrowband operation

The UIHC will plan on converting the UHF transmitters to narrowband operation.

The UIHC is a 3.5 million square ft facility that is very dense. Cellular providers have poor coverage throughout most of the facility. Because cell phone service is not available in many areas, staff are not able to use their cell phone or smartphone as a replacement option for their pager. However, we are in the process of selecting a vendor to deploy a Distributed Antenna System (DAS) in our facility, which may allow cell phones, smart phones and tablets to be used as a paging system alternative, thus facilitating the migration of pagers off of our UHF frequency. The DAS though may not be fully installed in time to migrate all paging system users off of the UHF frequency by January of 2013. Extending the deadline by one year will provide more time for this migration to occur following the DAS installation.

Funding sources, including whether the licensee's budget requires government approval or a multi-year budget process

The UIHC will be responsible for funding a replacement solution in its entirety. The UIHC is a state institution, with a fiscal year that runs from July 1 – June 30. One of the primary reasons for our waiver request is to provide us with a second fiscal year to fund this effort. We will need to request special funding for this project.

Whether the licensee's narrowbanding schedule is affected by neighboring systems due to interoperability relationships or other interdependencies

There are not any other neighboring systems or other interdependencies affecting the UIHC narrowbanding schedule.

Plans to minimize the negative impact of extended wideband operations on co-channel and adjacent channel operations, including a description of the spectrum environment in the affected area

Extended wideband operations of the UIHC UHF frequency for one year will not be impactful on any other systems or channel operations. There are no other systems utilizing this frequency in our affected areas.

If the licensee plans to migrate to a non-VHF/UHF band, whether it will relinquish VHF/UHF spectrum once it has migrated and the amount of spectrum to be relinquished

The UIHC will continue to utilize its UHF and VHF frequencies. It will not be relinquishing either frequency. Once we can successfully migrate critical care group emergent pages from pagers to other devices (smartphones) this can be re-evaluated.

What steps in the process have been or will be taken prior to January 1, 2013

The UIHC is in the process of installing a Distributed Antenna System (DAS). This will provide house-wide coverage for a variety of cellular carriers. Currently staff, patients and visitors are not able to use their cell phones in many locations, as the signal does not penetrate well within the facility. Once the DAS is in place it will facilitate the use of cell phones as an alternate means of communicating house-wide. We will also be migrating some pagers from the UHF to the VHF frequency.

Anticipated dates of commencement and completion of replacement or retuning of mobiles/portables

The UIHC has already begun migrating some pagers from its UHF to VHF frequency. We will begin purchasing pagers that can be narrowbanded on our UHF frequency, to replace the existing non-narrowband-capable pagers. It is anticipated that this process can be completed by January 1, 2014.

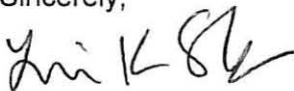
Anticipated dates of commencement and completion of infrastructure replacement or retuning

It is anticipated that the UIHC will retune its System 2 UHF transmitters, and narrowband-capable UHF pagers to narrowband by January, 2014.

Because of the FCC's change in ruling at this late date it is going to be unduly burdensome, both financially and logistically, for the UIHC to comply in the remaining timeframe. We are requesting a one-year extension to meet the narrowbanding requirements. Our intent is to fully comply with the mandate, but are requesting the extension due to the time we lost in the process because of the FCC's change in ruling. The additional year will give us the necessary time needed to finance and transition these devices to meet the FCC narrowbanding mandate.

Thank you for your consideration of this request.

Sincerely,



Lisa K Searls  
Assistant Director, Health Care Information Systems, Technical Operations Division  
University of Iowa Hospitals and Clinics  
319-356-4845

cc: Patrick Duffy, Director, HCIS Technical Operations

**Searls, Lisa**

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**From:** White, Brian A  
**Sent:** Thursday, July 15, 2010 10:59 AM  
**To:** Searls, Lisa  
**Subject:** FW:

Lisa,

I spoke with the FCC bandwidth contact person this morning and he confirmed in writing (see below) that our two channels are exempted from the bandwidth narrowing requirement.

Brian

Brian A. White  
Senior Assistant Director/ Legal Counsel  
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**From:** Melvin Spann [mailto:Melvin.Spann@fcc.gov]  
**Sent:** Thursday, July 15, 2010 9:41 AM  
**To:** White, Brian A  
**Subject:** RE:

Good Morning Mr. White -

Section 90.35 lists the Industrial/Business Pool (150-174 MHz and 421-512 MHz) bands which are mandated to narrowband. The two paging systems operating on 152.0075 MHz and 453.025 MHz are not listed in this section and are not required to narrowband. Hope this helps

Melvin K. Spann  
Electronics Engineer  
Mobility Division

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**From:** White, Brian A [mailto:brian-a-white@uiowa.edu]  
**Sent:** Wednesday, July 14, 2010 5:02 PM  
**To:** Melvin Spann  
**Subject:**

7/15/2010

Mr. Spann,

I am currently reviewing the rules and regulations regarding the narrowbanding requirement. We have two paging systems (one main system and one back-up) that run on VHF (152.0075) and UHF (453.025 –grandfathered) frequencies. Do you have a few moments anytime in the next few days where I can discuss the requirement and how it applies to our paging systems? I am flexible on times, so anytime that works for you will work for me. Thank you.

Brian

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7/15/2010

Searls, Lisa

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**From:** narrowbanding <narrowbanding@fcc.gov>  
**Sent:** Tuesday, May 24, 2011 10:00 AM  
**To:** Searls, Lisa  
**Subject:** RE: narrowbanding requirements  
**Attachments:** image001.jpg

Because we made a mistake. I think part of the confusion may have stemmed from the fact that your system also operates on one of the frequencies that is exempt. It was a confusing fact pattern

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**From:** Searls, Lisa [mailto:lisa-searls@uiowa.edu]  
**Sent:** Tuesday, May 24, 2011 10:13 AM  
**To:** narrowbanding  
**Subject:** RE: narrowbanding requirements

Why then were we told before by the FCC that we did NOT have to narrowband?

**From:** narrowbanding [mailto:narrowbanding@fcc.gov]  
**Sent:** Tuesday, May 24, 2011 9:11 AM  
**To:** Searls, Lisa  
**Subject:** RE: narrowbanding requirements

Lisa,

I'm sorry we have been playing phone tag.

The Hospital's waiver authorizes it to operate a paging-only system on a non-paging frequency. The exemption applies only to specific *frequencies*, not paging-only *systems*. That is the distinction.

Roberto

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**From:** Searls, Lisa [mailto:lisa-searls@uiowa.edu]  
**Sent:** Thursday, May 19, 2011 5:32 PM  
**To:** narrowbanding  
**Subject:** RE: narrowbanding requirements

Roberto – There is an FCC docket (FCC 04-292, WT Docket No. 99-87) that states in a bullet point that “We revise our Rules to exempt Part 90 paging-only frequencies from the narrowbanding requirements.” Because we are a paging-only frequency are we not exempt?

Lisa

**From:** narrowbanding [mailto:narrowbanding@fcc.gov]  
**Sent:** Wednesday, May 11, 2011 12:49 PM  
**To:** Searls, Lisa  
**Subject:** RE: narrowbanding requirements

Lisa,

After discussing the matter with several colleagues we came to the conclusion that the waiver only grandfathered the Hospital's ability to operate a paging-only system on a channel that would otherwise transition to voice operations, it did not exempt that channel from the narrowbanding requirement. The Hospital will have to narrowband that frequency.

Roberto

I am at 202-418-1428 if you wish to discuss.

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**From:** Searls, Lisa [mailto:lisa-searls@uiowa.edu]  
**Sent:** Tuesday, May 03, 2011 12:58 PM  
**To:** narrowbanding  
**Subject:** RE: narrowbanding requiements

Sounds great – thanks for touching base.

**From:** narrowbanding [mailto:narrowbanding@fcc.gov]  
**Sent:** Tuesday, May 03, 2011 11:58 AM  
**To:** Searls, Lisa  
**Subject:** RE: narrowbanding requiements

Haven't forgotten you, trying to get the various entities involved to give a final answer on this.

Roberto

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**From:** Searls, Lisa [mailto:lisa-searls@uiowa.edu]  
**Sent:** Thursday, April 21, 2011 10:38 AM  
**To:** narrowbanding  
**Subject:** narrowbanding requiements

We received a letter today from the FCC regarding the need for compliance with the January 1, 2013 narrowbanding deadline. The attorney for our hospital had correspondence in July of this year with the FCC (Melvin Spann, Mobility Division) and was told that the two paging systems we have currently operating are not required to narrowband. Do we need to get some sort of 'official' document or exception from the FCC as confirmation that we do not need to narrowband? Or is the previous email correspondence with the FCC adequate as proof of our exception?

Thank you.  
Lisa Searls

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